

UNITED STATES DISTRICT COURT

for the

District of Rhode Island



____ Division

Jimmy Smith, and similarly situated persons

Case No. _____

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Roger Williams Law School
United States Department of Education
American Bar Association

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Jimmy Smith
Street Address	43 Prospect Street
City and County	Bristol
State and Zip Code	Rhode Island 02809
Telephone Number	781-732-5095
E-mail Address	jsmith658@g.rwu.edu

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	Roger Williams Law School
Job or Title <i>(if known)</i>	
Street Address	10 Metacom Avenue
City and County	Bristol
State and Zip Code	Rhode Island 02809
Telephone Number	401-254-4500
E-mail Address <i>(if known)</i>	

Defendant No. 2

Name	United States Department of Education
Job or Title <i>(if known)</i>	
Street Address	5 Post Office Square
City and County	Boston
State and Zip Code	MA 02109
Telephone Number	1-800-872-5327
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	American Bar Association
Job or Title <i>(if known)</i>	
Street Address	1050 Connecticut Ave NW
City and County	Washington D.C.
State and Zip Code	20036
Telephone Number	202-662-1090
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

First Amendment right to petition, 5th amendment, 6th amendment, Section 1983, general fairness, Title IX, employment discrimination

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* Jimmy Smith, is a citizen of the State of *(name)* Massachusetts.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* Roger Williams Law School, is a citizen of the State of *(name)* Rhode Island. Or is a citizen of *(foreign nation)* _____.

b. If the defendant is a corporation

The defendant, (name) Roger Williams Law School, is incorporated under the laws of the State of (name) Rhode Island, and has its principal place of business in the State of (name) Rhode Island.
 Or is incorporated under the laws of (foreign nation) _____,
 and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):
 32,000,000

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

1. Roger Williams did not provide a fair hearing to me during the honor board process and subjected me to expulsion without an adequate opportunity to defend myself. My complaints were dismissed arbitrarily.
 2. RWU Law breached one or more contracts with me
 3. RWU Law has failed to recruit and hire adequate racial minority faculty and the USDofE and ABA should never have funded them after the "Ralph Pappito incident"
 4. The OCR investigation procedure is discriminatory on its face. Persons with certain disabilities cannot possibly file a complaint. In my situation the dismissal of my complaint against RWU Law on 3/19/2021 was arbitrary.
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IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

32,000,000 in damages actual or punitive
 RWU Law purposely gave me an unfair hearing and edited the Zoom hearing video so that my rights on appeal were not as live. RWU Law's Honor Board Process is supposed to be confidential but RWU either through indifference or purposeful action can never keep it secret. As the only law school in the state, they have a duty to make sure their hearings are fair and information is not leaked. Jared Goldstein, Lorraine Lalli, Tanya Monesteir, David Coombs, Olivia Milonas, Jenna Hashway and others agreed explicitly in part and implicitly in part to fore me to be a witness against myself in violation of the 5th amendment. Just this past week another one of my

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 03/19/2021

Signature of Plaintiff /s/ Jimmy Smith

Printed Name of Plaintiff Jimmy Smith

B. For Attorneys

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Street Address _____

State and Zip Code _____

Telephone Number _____

E-mail Address _____